

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SIGNODE INDUSTRIAL GROUP LLC,

Plaintiff,

v.

SAMUEL, SON & CO., LTD., ET AL.

Defendants.

Case No. 2:24-CV-00080-JRG

**DECLARATION OF ANDREAS KELLER IN SUPPORT OF PLAINTIFF SIGNODE
INDUSTRIAL GROUP LLC'S OPPOSITION TO
SAMUEL'S MOTION TO TRANSFER PURSUANT TO 28 U.S.C. § 1404(a)**

I, Andreas Keller, declare as follows:

1. I am a Team Leader at Signode Switzerland GmbH and lead the product development efforts relating to Signode Industrial Group LLC's ("Signode") battery-operated plastic strapping tools, such as the BXT4.

2. Signode's battery-operated combination plastic strapping tools have been designed, developed, and manufactured at Signode Switzerland GmbH's Dietikon, Switzerland facility for at least the past 20 years.

3. While Signode has increased its use of cloud-based storage such as MS-Teams or SharePoint over the last few years, the majority of the documents relating to the design, development, and manufacture of Signode's battery-operated plastic strapping tools are located on a Signode server in Dietikon, Switzerland. Similarly, all CAD data relating to Signode's battery-operated plastic strapping tools is stored locally in Dietikon, Switzerland.

I declare under penalty of perjury under the laws of the United States that the following is true and correct to the best of my knowledge, information, and belief.

Executed this 4th day of September, in Dietikon, Switzerland.



Andreas Keller